



United States Courthouse
Southern District of Texas
FILED

MAR 29 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

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CR. NO. H-18-

V.
BABAJIDE TOLULOPE BABATUNDE

18CR176

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about November 3, 2015, in the Houston Division of the Southern District of Texas,

BABAJIDE TOLULOPE BABATUNDE,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Republic of Ireland in the name of Jobi Johnson, to open an account at Capital One Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 2
(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about November 4, 2015, in the Houston Division of the Southern District of Texas,

BABAJIDE TOLULOPE BABATUNDE,

Defendant herein, did then and there willfully and knowingly use and attempt to use a

forged and/or counterfeit passport purported to be issued by the Republic of Ireland in the name of Jobi Johnson, to open an account at Chase Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 3
(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about March 28, 2016, in the Houston Division of the Southern District of Texas,

BABAJIDE TOLULOPE BABATUNDE,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Republic of Ireland in the name of Jobi Johnson, to open an account at Wells Fargo Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 4
(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about May 23, 2016, in the Houston Division of the Southern District of Texas,

BABAJIDE TOLULOPE BABATUNDE,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Republic of Guinea in the name of Justin Abe, to open an account at Chase Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT 5
(FALSE USE OF A PASSPORT - 18 U.S.C. §1543)

On or about October 26, 2016, in the Houston Division of the Southern District of Texas,

BABAJIDE TOLULOPE BABATUNDE,

Defendant herein, did then and there willfully and knowingly use and attempt to use a forged and/or counterfeit passport purported to be issued by the Federal Republic of Nigeria in the name of Olukola Collins, to open an account at Capital One Bank, and the defendant knew said passport was forged, counterfeit and otherwise procured unlawfully.

In violation of Title 18, United States Code, Sections 1543 and 2.

TRUE BILL:

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Original signature on File

~~FOREPERSON OF THE GRAND JURY~~/

RYAN K. PATRICK
United States Attorney

By:

Jay Hileman
JAY HILEMAN
Assistant United States Attorney